

Exhibit B

Radu Lelutiu

From: Radu Lelutiu
Sent: Tuesday, September 30, 2014 4:37 PM
To: Glen Summers; 'Kat Hacker'
Cc: Michael Valaik; Joshua Ackerman; Renee Grimmett; Jennifer Haltom Doan; Joshua Reed Thane; ContentGuard Counsel; Sam Baxter
Subject: RE: ContentGuard v. Amazon: Abbreviated Briefing on Motion for Ruling
Attachments: New Markman schedule.docx

Glen and Kat:

During yesterday's meet and confer you told us that Amazon and its co-Defendants would like ContentGuard's agreement to a plan whereby (1) by the end of October, ContentGuard serves supplemental infringement contentions that provide additional detail with respect to source code citations; (2) by the end of October, Defendants serve supplemental invalidity contentions; and (3) the parties modify the schedule for *Markman*-related exchanges and briefs.

ContentGuard is agreeable to this approach provided that (1) all Defendants and Google agree as well; and (2) Defendants agree to promptly make available for our review the source code that remains outstanding.

I attach for your consideration a document that outlines our suggested modifications to the *Markman* schedule. Please pass it on to the rest of the defense group.

Please let me know if you would like to discuss.

Thanks,
Radu

Event	Current deadline	New deadline
Comply with P.R. 4-1 (Exchange proposed terms and claim elements for construction)	October 3	October 24
Comply with P.R. 4-2 (Exchange preliminary claim constructions and extrinsic evidence)	October 24	November 14
Comply with P.R. 4-3 (Joint Claim Construction and Prehearing Statement)	November 12	November 21
Comply with P.R. 4-4 (Complete Claim Construction Discovery)	November 19	December 5
Comply with P.R. 4-5(a) (Opening Claim Construction Brief) and Submit Technical Tutorials (if any)	November 21	December 12
Comply with P.R. 4-5(b) (Responsive Claim Construction Brief)	December 22	January 7
*Comply with P.R. 4-5(c) (Reply Claim Construction Brief)	January 9	January 16
Parties to file a notice with the Court stating the estimated amount of time requested for the <i>Markman</i> Hearing. The Court will notify the parties if it is unable to accommodate this request.	January 23	Unchanged
*Comply with P.R. 4-5(d) (Joint Claim Construction Chart)	January 23	Unchanged
*Claim Construction Hearing	February 6	Unchanged